

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHARLES BROWN, Individually and On	)	Civil Action No. 05-10400-RCL
Behalf of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
BIOGEN IDEC INC., et al.,	)	
	)	
Defendants.	)	
	)	
<hr/>	)	Civil Action No. 05-10453-RCL
CARY GRILL, Individually and On Behalf of	)	
All Others Similarly Situated,	)	<u>CLASS ACTION</u>
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
BIOGEN IDEC INC., et al.,	)	
	)	
Defendants.	)	
	)	
<hr/>	)	

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MOTION FOR PARTICULARIZED DISCOVERY  
PURSUANT TO 15 U.S.C. § 78U-4(A)(3)(B)(IV)

ROCHELLE LOBEL, Individually and On	)	Civil Action No. 05-10801-RCL
Behalf of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
BIOGEN IDEC INC., et al.,	)	
	)	
Defendants.	)	
	)	
<hr/>	)	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

Class members The London Pensions Fund Authority and National Elevator Industry Pension Fund, hereby move this Court for an Order: (i) granting, in accordance with 15 U.S.C. § 78u-4(a)(3)(B)(iv), the particularized discovery set forth in the accompany memorandum; or, alternatively, (ii) denying the motion of the Biogen Institutional Investor Group for appointment as lead plaintiff for its failure to comply with the Court-ordered discovery. In support of this Motion, The London Pensions Fund Authority and National Elevator Industry Pension Fund submit herewith a Memorandum of Law, the Declaration of Theodore M. Hess-Mahan, dated September 9, 2005 and the Declaration of R. Steven Aronica, also dated September 9, 2005.

DATED: September 9, 2005

SHAPIRO HABER & URMY LLP

/S/

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CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 37.1(A)(2)

I hereby certify the parties' counsel conferred in a good faith effort to narrow or resolve the issues raised in this motion, as detailed in the exhibits attached to the accompanying Declaration of Theodore M. Hess-Mahan submitted in support hereof. The parties were unable to reach agreement.

**/s/Theodore M. Hess-Mahan**